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Attorneys for Defendant
Study Group U.S.A., d.b.a. Embassy Center for
English Studies

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANDREA JESSE,

Plaintiff,

vs.

STUDY GROUP USA, Inc., a Delaware
Corporation, and DOES 1 through 25
inclusive,

Defendants.

CASE NO.: 12-CV-04874-MMC

**STIPULATION AND ~~PROPOSED~~ ORDER
CONTINUING INITIAL CASE
MANAGEMENT CONFERENCE AND
EXTENDING THE DEADLINE FOR
COMPLETION OF PRIVATE ADR**

Date: ~~December 21, 2012~~
Time: 10:30 A.M.
Place: Courtroom 7, 19th Floor
Judge: Hon. Maxine M. Chesney

STIPULATION FOR CONTINUANCE OF INITIAL CASE MANAGEMENT CONFERENCE
AND EXTENDING DEADLINE FOR COMPLETION OF PRIVATE ADR

Plaintiff Andrea Jesse and Defendant Study Group USA, by and through their counsel of record, hereby stipulate and agree as follows:

WHEREAS, the Court scheduled the Initial Case Management Conference for December 21, 2012; and

WHEREAS, the Court on December 3, 2012 entered its order referring this matter to private ADR and setting a deadline to complete the ADR within ninety (90) days from the date of the Court's order; and

WHEREAS, Plaintiff Jesse's counsel of record in this matter, John F. Hyland, Rosha Jones, and Rukin Hyland Doria & Tindall LLP, intend to file a motion to withdraw as counsel in this case; and

WHEREAS, the parties believe it would best serve the interests of the Court and the parties to conduct the Initial Case Management Conference after the Court has ruled on the motion to withdraw and Plaintiff Jesse has retained new counsel to represent her in this matter;

WHEREAS, the parties believe they can most effectively and efficiently conduct private ADR after the Court has ruled on the motion to withdraw and Plaintiff Jesse has retained new counsel to represent her in this matter and in the ADR process; and

WHEREAS, the parties do not believe that continuance of the Initial Case Management Conference or extension of the deadline to complete ADR will cause undue prejudice to any party;

IT IS HEREBY STIPULATED AND AGREED that the Court should continue the Initial Case Management Conference for ninety (90) days to allow sufficient time for Plaintiff Jesse's counsel of record in this case to file its motion to withdraw as counsel, for the Court to consider and rule on the motion, for Plaintiff Jesse to retain new counsel to represent her in this matter, and for such new counsel to familiarize himself or herself such that he or she can meaningfully participate in the Initial Case Management Conference. The parties further STIPULATE AND

1 AGREE that the Court should extend the deadline for completion of the private ADR to which
2 the Court ordered this matter until a date no earlier than sixty (60) days from the continued date
3 of the Case Management Conference.

4 Dated: December 12, 2012

RUKIN HYLAND DORIA & TINDALL LLP

6 By: _____/s/

7 John F. Hyland (State Bar No. 178875)
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8 Rosha Jones (State Bar No.279143)
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9
10 Dated: December 12, 2012

MORGAN, LEWIS & BOCKIUS LLP

11 By: _____/s/

12 L. Julius M. Turman (State Bar No. 226126)
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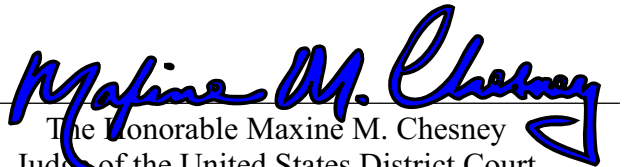
13 Shannon Nakabayashi (State Bar No. 215469)
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ORDER

The Court, having considered the Stipulation of the parties and having concluded that the filing of a motion by Plaintiff Jesse's attorneys of record to withdraw as counsel in this case constitutes good cause for the continuance of the Initial Case Management Conference and extension of the deadline by which the parties must complete private ADR, hereby continues the Conference until March 22, 2013. The Parties shall submit a Joint Report no later than seven (7) days prior to the Conference. The Parties shall complete private ADR no later than sixty (60) days from the date of the Conference.

IT IS SO ORDERED.

Dated: December 13, 2012


The Honorable Maxine M. Chesney
Judge of the United States District Court
Northern District of California